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Attorneys for Defendants
UBER TECHNOLOGIES, INC., RASIER, LLC,
And RASIER-CA, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

This Document Relates to:

M.J. v. Uber Technologies, Inc., et al.,
No. 3:25-cv-08088-CRB

Case No. 3:23-md-03084-CRB

**DECLARATION OF CHRISTOPHER V.
COTTON IN SUPPORT OF DEFENDANTS'
OPPOSITION TO MOTION TO
WITHDRAW AS COUNSEL OF RECORD**

Judge: Honorable Charles R. Breyer

DECLARATION OF CHRISTOPHER V. COTTON

I, Christopher V. Cotton, declare pursuant to 28 U.S.C. § 1746:

1. I am over the age of 18 and am a resident of Kansas City, Missouri. I respectfully submit this declaration in support of Defendants Uber Technologies, Inc.’s, Rasier, LLC’s, and Rasier-CA, LLC’s (collectively, “Defendants”) opposition to the Wagstaff Law Firm’s (“Wagstaff’s”) motion to withdraw as counsel for Plaintiff M.J.

2. I am a partner at the law firm of Shook, Hardy & Bacon L.L.P., representing Defendants in this MDL as well as in Judicial Council Coordination Proceeding No. 5188, *In Re: Uber Rideshare Cases*, Case No. CJC-21-005188 (the “JCCP”). I am a member in good standing of the Bar of the State of Iowa, the Bar of the State of Missouri, and the Bar of the State of Wisconsin. I make this declaration based upon matters within my own personal knowledge. If called as a witness, I could and would competently testify to the matters set forth herein.

3. Uber was unable to substantiate Plaintiff M.J.’s alleged Uber ride and communicated that to Wagstaff via a Defendant’s Fact Sheet on October 24, 2025. The Wagstaff firm informed Uber of intent to withdraw in this matter via an email sent to me and others on October 29, 2025 at 1:04 PM Pacific time. It then filed its Motion to Withdraw approximately one hour later, at 2:05 PM Pacific time.

4. In response to the email from the Wagstaff firm, on October 29, 2025, at approximately 5:37 PM Pacific, I emailed the Wagstaff firm and stated that the Plaintiff in this case submitted a non-bona-fide receipt. I also stated that Uber will be seeking a dismissal with prejudice and that Uber would oppose the motion to withdraw.

I declare under penalty of perjury under the laws of the State of Missouri that the foregoing is true and correct. Executed on October 30, 2025, in Kansas City, Missouri.

SHOOK, HARDY & BACON L.L.P.

/s/ Christopher V. Cotton

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